

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

**DAWN M. JENKINS,**

**Plaintiff,**

**v.**

**AFNI, INC., DIVERSIFIED  
CONSULTANTS, INC., EQUIFAX  
INFORMATION SERVICES LLC, and  
EXPERIAN INFORMATION  
SOLUTIONS, INC.,**

**Defendants.**

**CIVIL ACTION NO. 1:12-CV-10622-WGY**

**JOINT MOTION TO CONTINUE PRETRIAL DEADLINES AND TRIAL**

NOW COME Defendants Equifax Information Services LLC (“Equifax”) and Experian Information Solutions, Inc. (“Experian”), by their undersigned counsel, and file this Joint Motion to Continue Pretrial Deadlines and Trial as follows:<sup>1</sup>

1. Defendants Equifax and Experian filed a Joint Motion for Summary Judgment (the “Motion”) in this action on April 24, 2013. (Doc. 76.)
2. After Plaintiff was granted extensions of time to file a response to the Motion (Doc. 83), Plaintiff filed her Opposition to the Motion on June 11, 2013. (Doc. 87.) On June 18, 2013, Equifax and Experian filed a Reply in Support of the Motion. (Doc. 88.)
3. The Court has not yet issued a ruling on the Motion.
4. During a scheduling conference before Judge William G. Young on September 20, 2012, this action was placed on the running trial list for October 2013 and the parties were

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<sup>1</sup> A Stipulation of Dismissal of Defendant Afni, Inc. was filed on August 13, 2013 (Doc. 89), and Defendant Afni was terminated from the case on that date.

instructed to file the final pretrial memo on the first Monday of the month prior to trial. (Doc. 36.) The first Monday of September 2013 is September 2, 2013 (Labor Day).

5. By Order dated August 27, 2013, this case was scheduled for a final pretrial conference on September 16, 2013 at 2:00 p.m., and for trial to commence on or after October 7, 2013.

6. Rule 16 of the Federal Rules of Civil Procedure states that a schedule may be modified upon a showing of good cause. Fed. R. Civ. P. 16(b)(4).

7. Good cause exists to extend the pre-trial deadlines and trial setting in this case so that the Court may have adequate time to rule on Equifax's and Experian's Joint Motion for Summary Judgment.

8. Defendants Equifax and Experian therefore respectfully request that the schedule be modified to postpone the pretrial deadlines and trial to dates to be set, if still necessary, after the Court's ruling on the Motion.

9. This motion is not filed for delay or for any other improper purpose, but to conserve the parties' and the Court's resources while the Court considers the Defendants' Joint Motion for Summary Judgment.

10. The undersigned counsel for Experian, Maureen McAneny, conferred via email today with Plaintiff, who indicated that she does not oppose this request.

Dated: August 27, 2013

Respectfully submitted,

**EQUIFAX INFORMATION SERVICES LLC**

by its attorneys,

/s/ Brian J. Olson

Brian J. Olson (admitted *pro hac vice*)

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**EXPERIAN INFORMATION SOLUTIONS, INC.**

by its attorneys,

/s/ Maureen P. McAneny

Maureen P. McAneny (admitted *pro hac vice*)

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*Attorneys for Defendant Experian Information  
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**CERTIFICATE OF SERVICE**

I certify that this document, filed through the ECF system, was sent electronically to the registered participants as identified on the Notice of Electronic Filing and paper copies were sent to those indicated as non-registered participants.

**SERVICE LIST**

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Dated: August 27, 2013

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